


SEP 17 2007

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MICHAEL N. MILBY, CLERK OF COURT

UNITED STATES OF AMERICA

VS

1. NGUYEN THI DAO VO, aka
"Sister One"
2. HONGKHAI NGUYEN, aka
"Brother Six"
3. LY PHAN LE
4. NGUYEN QUANG HOANG

6. HUYEN THI MONG TRAN,
aka "Helen" aka "Lady
Boss" aka "Sister
Den" aka "Lady Den"
7. CHUONG NGUYEN, aka
"Gay"
8. DANNY CHAU, aka "Dog
Boy" aka "Dog Guy"
9. DINH VAN VU, aka
"Sandy Vu"
10. DUY KHAN HOANG LE aka
"Fish Guy"
11. LAN NGO, aka "Brother
Lan"
12. SON THANH TRAN

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CRIMINAL NO. H-07-

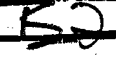
INDICTMENT UNDER SEAL

Sealed

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prohibited by court order.

TRUE COPY I CERTIFY
ATTEST: 9/18/07

MICHAEL N. MILBY, Clerk of Court

By  Deputy Clerk

THE GRAND JURY CHARGES:

COUNT 1

Conspiracy to Commit Money Laundering

The Conspiracy

From in or about December, 2006, and continuing thereafter up to and including the date of this indictment, in the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court,

NGUYEN THI DAO VO, aka "Sister One",

HONGKHAI NGUYEN, aka "Brother Six",

LY PHAN LE,

NGUYEN QUANG HOANG,

~~REDACTED~~,

HUYEN THI MONG TRAN, aka "Helen" aka "Lady Boss" aka "Sister Den" aka "Lady Den",

CHUONG NGUYEN, aka "Gay",

DANNY CHAU, aka "Dog Boy" aka "Dog Guy",

DINH VAN VU, aka "Sandy Vu",

DUY KHAN HOANG LE, aka "Fish Guy",

LAN NGO, aka "Brother Lan",

and

SON THANH TRAN,

defendants herein, did knowingly and intentionally agree, combine, conspire and confederate with each other and others known and unknown to the Grand Jury, to commit the following offenses:

1. To knowingly conduct and attempt to conduct a

financial transaction affecting interstate and foreign commerce, that is, the transfer of United States currency, which involved the proceeds of specified unlawful activity, namely, violations of Title 21, United States Code, Sections 841 and 846, with the intent to promote the carrying on of the specified unlawful activity and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A).

2. To knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, the transfer of United States currency, which involved the proceeds of specified unlawful activity, namely, violations of Title 21, United States Code, Sections 841 and 846, knowing that the transaction in whole or in part was designed to conceal or disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity and, knowing the property involved in the financial transaction represented the proceeds of some form of

unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B).

In violation of Title 18, United States Code, Section 1956(h).

Manner and Means of the Conspiracy

1. It was a part of the conspiracy that one or more of the conspirators would request or direct one or more other members of the conspiracy to travel to locations to collect or acquire narcotics proceeds from one or more co-conspirators.

2. It was further a part of the conspiracy that following the collection or acquisition of the narcotics proceeds, one or more of the conspirators would request or direct one or more other members of the conspiracy to transport the narcotics proceeds to other individuals for subsequent disposition and transfer.

3. It was further a part of the conspiracy that one or more members of the conspiracy would be paid money for transporting, transferring, and disposing of the narcotics proceeds to the care of others.

All in violation of Title 18, United States Code, §

1956(h) .

OVERT ACTS

In furtherance of the conspiracy described in count one and to effect the objects thereof, the defendants named therein and other persons both known and unknown to the Grand Jury, performed or caused the performance of the following Overt Acts, among others not described herein, in the Southern District of Texas and elsewhere:

1. The Grand Jury specifically realleges and adopts by reference each and every allegation contained in Counts 2 through 14.

2. Between the dates of December 16, to December 20, 2006, a courier traveled from Houston, Texas, to Philadelphia, Pennsylvania, met with an individual, took possession of \$155,000 in United States currency from that individual, and then delivered those funds to another individual in Dallas, Texas.

3. On or about January 16, 2007, an individual possessed \$575,150 in United States currency which was seized by law enforcement officers in Los Angeles, California.

4. Between the dates of January 19, to January 24, 2007, a courier traveled from Houston, Texas, to Philadelphia, Pennsylvania, met with an individual, took possession of \$200,000 in United States currency from that individual, traveled to Romulus, Michigan, met with a second individual, took possession of \$50,000 in United States currency, and then delivered the total of \$250,000 in United States currency to a third individual in Romulus, Michigan.

5. Between the dates of January 26, to January 29, 2007, approximately \$9,785 in United States currency was transferred by wire from Canada to a bank account in Houston, Texas, belonging to a courier.

6. Between the dates of February 22, to February 25, 2007, a courier traveled from Houston, Texas, to Los Angeles, California, with \$295,000 in United States currency met [REDACTED], in Los Angeles, California, and received from [REDACTED], [REDACTED], an additional \$317,250 in United States currency.

7. Between the dates of February 22, to February

25, 2007, a courier met an individual in Los Angeles, California, and delivered to the individual \$300,000 in United States currency.

8. On or about February 25, 2007, an individual possessed \$460,500 in United States currency which was seized by law enforcement officers in Chino Hills, California.

9. Between the dates of February 22, to February 25, 2007, a courier met an individual in Los Angeles, California, and delivered to the individual \$312,250 in United States currency.

10. On or about February 25, 2007, a courier delivered \$312,250 in United States currency to an individual in Los Angeles, California. Thereafter, the individual was observed at storage unit A-408, 8180 East Old Canal Road, Anaheim Hills, California.

11. On or about April 5, 2007, a gray 2005 truck bearing British Columbia, Canada license plate number UEX24F was driven to storage unit A-408, 8180 East Old Canal Road, Anaheim Hills, California, from which location \$892,040 in United States currency was later

seized by law enforcement officers.

12. On or about April 7, 2007, an individual possessed fifty kilograms of cocaine secreted in a trailer towed by a gray 2005 truck bearing British Columbia, Canada license plate number UEX24F which cocaine was seized at the Port of Entry in Oroville, Washington.

13. Between the dates of March 5, and March 8, 2007, a courier traveled from Houston, Texas, to St. Paul, Minnesota, met with **SON THANH TRAN** and took possession of \$150,000 in United States currency.

14. Between the dates of March 5, and March 8, 2007, a courier traveled from St. Paul, Minnesota, to Chicago, Illinois, met with an individual and took possession of \$150,000 in United States currency.

15. Between the dates of March 5, and March 8, 2007, a courier traveled from Chicago, Illinois, to Romulus, Michigan, where the courier met with an individual in Romulus, Michigan, and delivered to the individual \$300,100 in United States currency.

16. On or about March 8, 2007, an individual

possessed \$300,100 in United States currency which was seized by law enforcement officers in Detroit, Michigan.

17. Between the dates of May 1, and May 2, 2007, **DANNY CHAU**, aka "Dog Boy" aka "Dog Guy", traveled to Houston, Texas and received approximately \$200,000 in United States currency from **NGUYEN QUANG HOANG** in Houston.

18. On or about May 21, 2007, an individual was stopped by law enforcement officers in New Castle County, Delaware and \$245,000 in United States currency was seized.

19. On or about May 22, 2007, [REDACTED], [REDACTED], was observed delivering a blue duffle bag to two female individuals in Los Angeles, California.

20. On or about May 22, 2007, two female individuals occupied a vehicle from which law enforcement officers seized \$473,930 in United States currency.

COUNT 2

That between the dates of January 11, to January 16, 2007, in the Houston Division of the Southern District of Texas, and elsewhere,

NGUYEN THI DAO VO, aka "Sister One",
and
HONGKHAI NGUYEN, aka "Brother Six",

defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, the transfer of approximately \$220,000 in United States Currency, and which involved the proceeds of specified unlawful activity, namely, violations of Title 21, United States Code, Sections 841 and 846, with the intent to promote the carrying on of the specified unlawful activity, and knowing that the transaction in whole or in part was designed to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and 1956(a)(1)(A)(i) and (B)(i).

COUNT 3

That on or about February 11, to February 15, 2007, in the Houston Division of the Southern District of Texas, and elsewhere,

**NGUYEN THI DAO VO, aka "Sister One",
and
LY PHAN LE**

defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, the transfer of \$150,000 in United States currency, and which involved the proceeds of specified unlawful activity, namely, violations of Title 21, United States Code, Sections 841 and 846, with the intent to promote the carrying on of the specified unlawful activity, and knowing that the transaction in whole or in part was designed to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and 1956(a)(1)(A)(i) and (B)(i).

COUNT 4

That between the dates of February 15, to February 16, 2007, in the Houston Division of the Southern District of Texas, and elsewhere,

NGUYEN THI DAO VO, aka "Sister One",
NGUYEN QUANG HOANG, and
LY PHAN LE,

defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, the transfer of approximately \$100,000 in United States Currency, and which involved the proceeds of specified unlawful activity, namely, violations of Title 21, United States Code, Sections 841 and 846, with the intent to promote the carrying on of the specified unlawful activity, and knowing that the transaction in whole or in part was designed to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and 1956(a)(1)(A)(i) and (B)(i).

COUNT 5

That on or about February 21, 2007, in the Houston Division of the Southern District of Texas, and elsewhere,

NGUYEN THI DAO VO, aka "Sister One",

defendant herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, the transfer of approximately \$160,000 in United States Currency, and which involved the proceeds of specified unlawful activity, namely, violations of Title 21, United States Code, Sections 841 and 846, with the intent to promote the carrying on of the specified unlawful activity, and knowing that the transaction in whole or in part was designed to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and 1956(a)(1)(A)(i) and (B)(i).

COUNT 6

That on or about February 21, 2007, in the Houston Division of the Southern District of Texas, and elsewhere,

NGUYEN THI DAO VO, aka "Sister One",

and

NGUYEN QUANG HOANG,

defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, the transfer of approximately \$70,000 in United States Currency, and which involved the proceeds of specified unlawful activity, namely, violations of Title 21, United States Code, Sections 841 and 846, with the intent to promote the carrying on of the specified unlawful activity, and knowing that the transaction in whole or in part was designed to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and 1956(a)(1)(A)(i) and (B)(i).

COUNT 7

That Between the dates of March 19, to March 20, 2007, in the Houston Division of the Southern District of Texas, and elsewhere,

NGUYEN THI DAO VO, aka "Sister One",
and
CHUONG NGUYEN, aka "Gay",

defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, the transfer of approximately \$17,000 in United States Currency, and which involved the proceeds of specified unlawful activity, namely, violations of Title 21, United States Code, Sections 841 and 846, with the intent to promote the carrying on of the specified unlawful activity, and knowing that the transaction in whole or in part was designed to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and 1956(a)(1)(A)(i) and (B)(i).

COUNT 8

That between the dates of March 29, to March 30, 2007, in the Houston Division of the Southern District of Texas, and elsewhere,

[REDACTED], [REDACTED],
and
CHUONG NGUYEN, aka "Gay,"

defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, the transfer of approximately \$200,300 in United States Currency, and which involved the proceeds of specified unlawful activity, namely, violations of Title 21, United States Code, Sections 841 and 846, with the intent to promote the carrying on of the specified unlawful activity, and knowing that the transaction in whole or in part was designed to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and 1956(a)(1)(A)(i) and (B)(i).

COUNT 9

That between the dates of May 25, to June 2, 2007, in the Houston Division of the Southern District of Texas, and elsewhere,

NGUYEN THI DAO VO, aka "Sister One",
DINH VAN VU, aka "Sandy Vu", and
DANNY CHAU, aka "Dog Boy" aka "Dog Guy",

defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, the transfer of approximately \$196,000 in United States Currency, and which involved the proceeds of specified unlawful activity, namely, violations of Title 21, United States Code, Sections 841 and 846, with the intent to promote the carrying on of the specified unlawful activity, and knowing that the transaction in whole or in part was designed to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and 1956(a)(1)(A)(i) and (B)(i).

COUNT 10

That between the dates of May 31, to June 4, 2007, in the Houston Division of the Southern District of Texas, and elsewhere,

NGUYEN THI DAO VO, aka "Sister One",
HUYEN THI MONG TRAN, aka "Helen" aka "Lady Boss" aka
"Sister Den" aka "Lady Den",

DANNY CHAU, aka "Dog Boy" aka "Dog Guy", and

CHUONG NGUYEN, aka "Gay",

defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, the transfer of approximately \$420,000 in United States Currency, and which involved the proceeds of specified unlawful activity, namely, violations of Title 21, United States Code, Sections 841 and 846, with the intent to promote the carrying on of the specified unlawful activity, and knowing that the transaction in whole or in part was designed to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and 1956(a)(1)(A)(i) and (B)(i).

COUNT 11

That between the dates of June 28, to July 7, 2007,
in the Houston Division of the Southern District of
Texas, and elsewhere,

**NGUYEN THI DAO VO, aka "Sister One",
SON THANH TRAN, and
LAN NGO, aka "Brother Lan",**

defendants herein, and others known and unknown to the
Grand Jury, aiding and abetting each other, did knowingly
conduct and attempt to conduct a financial transaction
affecting interstate and foreign commerce, that is, the
transfer of approximately \$99,910 in United States
Currency, and which involved the proceeds of specified
unlawful activity, namely, violations of Title 21, United
States Code, Sections 841 and 846, with the intent to
promote the carrying on of the specified unlawful
activity, and knowing that the transaction in whole or
in part was designed to conceal or disguise the nature,
the location, the source, the ownership, or the control
of the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and
1956(a)(1)(A)(i) and (B)(i).

COUNT 12

That between the dates of July 23, to July 25, 2007, in the Houston Division of the Southern District of Texas, and elsewhere,

NGUYEN THI DAO VO, aka "Sister One",
DUY KHAN HOANG LE, aka "Fish Guy", and
LAN NGO, aka "Brother Lan",

defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, the transfer of approximately \$100,000 in United States Currency, and which involved the proceeds of specified unlawful activity, namely, violations of Title 21, United States Code, Sections 841 and 846, with the intent to promote the carrying on of the specified unlawful activity, and knowing that the transaction in whole or in part was designed to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and 1956(a)(1)(A)(i) and (B)(i).

COUNT 13

That between the dates of July 23, to August 9, 2007,
in the Houston Division of the Southern District of
Texas, and elsewhere,

**NGUYEN THI DAO VO, aka "Sister One",
LAN NGO, aka "Brother Lan", and
DINH VAN VU, aka "Sandy Vu",**

defendants herein, and others known and unknown to the
Grand Jury, aiding and abetting each other, did knowingly
conduct and attempt to conduct a financial transaction
affecting interstate and foreign commerce, that is, the
transfer of approximately \$70,000 in United States
Currency, and which involved the proceeds of specified
unlawful activity, namely, violations of Title 21, United
States Code, Sections 841 and 846, with the intent to
promote the carrying on of the specified unlawful
activity, and knowing that the transaction in whole or
in part was designed to conceal or disguise the nature,
the location, the source, the ownership, or the control
of the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and
1956(a)(1)(A)(i) and (B)(i).

COUNT 14

That between the dates of July 31, to August 9, 2007,
in the Houston Division of the Southern District of
Texas, and elsewhere,

NGUYEN THI DAO VO, aka "Sister One",
HUYEN THI MONG TRAN, aka "Helen" aka "Lady Boss" aka
"Sister Den" aka "Lady Den",
DUY KHAN HOANG LE aka "Fish Guy", and
LAN NGO, aka "Brother Lan",
defendants herein, and others known and unknown to the
Grand Jury, aiding and abetting each other, did knowingly
conduct and attempt to conduct a financial transaction
affecting interstate and foreign commerce, that is, the
transfer of approximately \$40,000 in United States
Currency, and which involved the proceeds of specified
unlawful activity, namely, violations of Title 21, United
States Code, Sections 841 and 846, with the intent to
promote the carrying on of the specified unlawful
activity, and knowing that the transaction in whole or in
part was designed to conceal or disguise the nature, the
location, the source, the ownership, or the control of
the proceeds of specified unlawful activity.

In violation of 18 U.S.C. Sections 2 and
1956(a)(1)(A)(i) and (B)(i).

NOTICE OF CRIMINAL FORFEITURE

(18 U.S.C. § 982)

Pursuant to Title 18, United States Code, Section 982, as a result of the commission of the money laundering offenses as charged in counts one through fourteen in the indictment, notice is given to the defendants,

**NGUYEN THI DAO VO, aka "Sister One",
HONGKHAI NGUYEN, aka "Brother Six",
LY PHAN LE,
NGUYEN QUANG HOANG,**

**[REDACTED],
HUYEN THI MONG TRAN, aka "Helen" aka "Lady Boss" aka
"Sister Den" aka "Lady Den" aka "Lady Den",
CHUONG NGUYEN, aka "Gay",
DANNY CHAU, aka "Dog Boy" aka "Dog Guy",
DINH VAN VU, aka "Sandy Vu",
DUY KHAN HOANG LE, aka "Fish Guy",
LAN NGO, aka "Brother Lan",
and
SON THANH TRAN,**

that in the event of conviction, the United States intends to forfeit all property, real and personal, involved in such offense and all property traceable to such property, including, but not limited to, the following property:

Approximately \$ 10,000,000.00 in United States currency.

SUBSTITUTE ASSETS

In the event that property subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon exercise of due diligence;
- b. has been placed beyond the jurisdiction of the Court;
- c. has been transferred or sold to, or deposited with a third party;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendants up to the value of such property, pursuant to Title 18, United States

